

November 19, 2013

By Electronic Mail

George T. Czerniak
Director, Air and Radiation Division
U.S. Environmental Protection Agency
77 West Jackson Boulevard
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Nicole Cantello
Attorney-Advisor
U.S. Environmental Protection Agency
77 West Jackson Boulevard
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**Re: Request for Extension of Time to Respond to November 15, 2013 Clean Air Act
Information Request Issued Pursuant to Clean Air Act Section 114**

Dear Mr. Czerniak and Ms. Cantello:

I write on behalf of KCBX Terminals Company ("KCBX") to respectfully request an extension of certain deadlines in the November 15, 2013 information request issued to KCBX Terminals Company ("KCBX") by the United States Environmental Protection Agency ("EPA"). Specifically, Request Numbers 1, 2, and 18 direct KCBX to submit certain information to EPA within 15 days of receipt of the information request, a time period that ends on Saturday, November 30, 2013 (with the next business day being Monday, December 2, 2013). For the reasons detailed below, KCBX believes that it will not be able to prepare the requested information within the time provided, and therefore seeks an extension of two weeks – until December 16, 2013 – to respond to Requests Number 1, 2 and 18 of EPA's information request.

KCBX has promptly taken steps to begin preparing responses to Request Number 1, 2, and 18, which respectively direct KCBX to propose PM₁₀ monitoring site locations at KCBX's plants in Chicago, Illinois (the "North Plant" and "South Plant"), submit a map of the facility sites, and propose petroleum coke sampling points for both plants. KCBX has retained experts to assist in identifying PM₁₀ monitoring sites that will meet the criteria referenced in EPA's information request and allow KCBX to effectively perform the requested monitoring. Those consultants have indicated that they are unlikely to be able to identify appropriate sites by December 2, 2013, and have provided a professional estimate that a deadline of December 16, 2013, will allow sufficient time for the necessary work to be accomplished.

The experts will need to evaluate both the North Plant and the South Plant to assess potential monitoring sites, including whether a sufficient power supply for the monitors can be

delivered to a potential site (a question that will likely require input from a professional electrician, and may also require permitting from local authorities); whether a potential site is in a secure, tamper-proof location; and where to position the monitors in order to account for prevailing winds and minimize the confounding effect of other sources of PM₁₀. Additionally, KCBX is considering whether it can best comply with EPA's information request by co-locating the meteorological tower required by Request Number 11 at one of the PM₁₀ monitoring sites, which introduces further factors such as whether the site will allow for construction of an adequate base for such a tower. KCBX and its consultants must consider and resolve all of these issues before being able to propose suitable monitoring sites to EPA.

Given that KCBX received EPA's information request in the late afternoon of Friday, November 15, and the Thanksgiving holiday is on Thursday, November 27, the information request afforded KCBX only nine business days to complete this process (of which two are the days before and after Thanksgiving). Additionally, the holiday will make it difficult to schedule any travel necessary for KCBX's consultants to evaluate the site and work with KCBX to identify appropriate monitoring locations within this abbreviated time period. KCBX is committed to working cooperatively with EPA to site PM₁₀ monitoring stations and conduct the monitoring required by the information request. However, KCBX and its experts need more time than is offered by the information request to be able to develop information that meets the criteria set forth by EPA. Therefore, on behalf of KCBX, I respectfully request an extension of the deadline for responding to Request Numbers 1, 2, and 18 in the information request until December 16, 2013. Please do not hesitate to contact me with any questions regarding this extension request.

Sincerely,

/s/ Adam M. Kushner
Adam M. Kushner

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